

CIVIL COMPLAINT FORM TO BE USED BY A *PRO SE* PRISONER

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Abdullah A. Taji Jr. 086416
Full Name of Plaintiff Inmate Number

v.

Gregory Briggs
Name of Defendant 1

Roger Lucas
Name of Defendant 2

Bruce LeValley
Name of Defendant 3

Latoriya Ray
Name of Defendant 4

Lionel Pierre
Name of Defendant 5

(Print the names of all defendants. If the names of all defendants do not fit in this space, you may attach additional pages. Do not include addresses in this section).

Civil No. _____
(to be filled in by the Clerk's Office)

☒ Demand for Jury Trial
☐ No Jury Trial Demand

FILED
HARRISBURG, PA

FEB 06 2024

PER [Signature]
DEPUTY CLERK

I. NATURE OF COMPLAINT

Indicate below the federal legal basis for your claim, if known.

- ☒ Civil Rights Action under 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Civil Rights Action under Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971) (federal defendants)
- ☐ Negligence Action under the Federal Tort Claims Act (FTCA), 28 U.S.C. § 1346, against the United States

II. ADDRESSES AND INFORMATION

A. PLAINTIFF

Abdullah, Taji, A
Name (Last, First, MI)
086416
Inmate Number
Dauphin County Prison
Place of Confinement
501 main Rd
Address
Harrisburg, Dauphin, Pennsylvania, 17111
City, County, State, Zip Code

Indicate whether you are a prisoner or other confined person as follows:

- | | |
|-------------------------------------|------------------------------------------|
| <input type="checkbox"/> | Pretrial detainee |
| <input type="checkbox"/> | Civilly committed detainee |
| <input type="checkbox"/> | Immigration detainee |
| <input checked="" type="checkbox"/> | Convicted and sentenced state prisoner |
| <input type="checkbox"/> | Convicted and sentenced federal prisoner |

B. DEFENDANT(S)

Provide the information below for each defendant. Attach additional pages if needed.

Make sure that the defendant(s) listed below are identical to those contained in the caption. If incorrect information is provided, it could result in the delay or prevention of service of the complaint.

Defendant 1:

Briggs, Gregory
Name (Last, First)
Warden of Dauphin County Prison
Current Job Title
501 main Rd
Current Work Address
Harrisburg, Dauphin, Pennsylvania, 17111
City, County, State, Zip Code

Defendant 2:

Lucas, Roger
Name (Last, First)
Custody/Security Major
Current Job Title
501 main Rd
Current Work Address
Harrisburg, Dauphin, Pennsylvania, 17111
City, County, State, Zip Code

Defendant 3:

Bruce LeVallley
Name (Last, First)
Deputy warden of operations
Current Job Title
501 main Rd
Current Work Address
Harrisburg, Dauphin, Pennsylvania, 17111
City, County, State, Zip Code

Defendant 4:

Ray, Latonya
Name (Last, First)
Deputy warden of Treatment
Current Job Title
501 main Rd
Current Work Address
Harrisburg, Dauphin, Pennsylvania, 17111
City, County, State, Zip Code

Defendant 5:

Lionel Pierre
Name (Last, First)
Deputy warden of security
Current Job Title
501 main Rd
Current Work Address
Harrisburg, Dauphin, Pennsylvania, 17111
City, County, State, Zip Code

III. STATEMENT OF FACTS

State only the facts of your claim below. Include all the facts you consider important. Attach additional pages if needed.

- A. Describe where and when the events giving rise to your claim(s) arose.

In Dauphin County Prison while in the RHU, on November 26th 2023 - December 17th 2023.

- B. On what date did the events giving rise to your claim(s) occur?

November 26th 2023 to December 17th 2023.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?)

My constitutional rights were violated. All of my legal mail was stolen from me by C.O. Rodriguez because he was given the direct order from Warden Pierre to retaliate for prisoner grievances.

My access to the United States Postal Service was infringed upon. The Warden gave a direct order to confiscate all writing material and paper / envelopes to retaliate for prisoner grievances.

My access to the courts were infringed upon. I was subject to cruel and unusual punishment. I was forced to live in complete darkness for 15 days straight. I had to eat, urinate and defecate in utter darkness, which in turn caused me to consume insects, hair and other unknown substances.

My access to religious library was infringed upon. No paper books are allowed in Dauphin County Prison so all bibles and Qurans are accessed through the getting out tablet system. All tablets were confiscated through out the whole prison on November 16th 2023, and not returned until December 19th 2023.

All of above complaints were direct orders given by the Warden to Correctional officers.

IV. LEGAL CLAIM(S)

You are not required to make legal argument or cite any cases or statutes. However, state what constitutional rights, statutes, or laws you believe were violated by the above actions. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs. Attach additional pages if needed.

1. USCS 8th Amendment - Cruel and Unusual Punishment
2. USCS 4th Amendment - Illegal Search and Seizure
3. USCS 5th Amendment - Due Process
4. USCS 14th Amendment - Due Process
5. Pa. Const. Art. 1 § 8 - Security From Searches and Seizure
6. Pa. Const. Art. 1 § 9 - Inherent Rights of Mankind / Due Process
7. USCS 1st Amendment - Religious Freedom and Political Freedom
8. Pa. Const. Art. 1 § 3 - Religious Freedom
9. Pa. Const. Art. 1 § 7 - Freedom of Speech
10. Pa. Const. Art. 1 § 20 - Right of Petition

V. INJURY

Describe with specificity what injury, harm, or damages you suffered because of the events described above.

my mental health has deteriorated. I can't sleep. I'm afraid to eat. I'm afraid of the dark. I think people out to get me. Anxiety, depression, and insomnia. Torts for above listed Constitutional violations

VI. RELIEF

State exactly what you want the court to do for you. For example, you may be seeking money damages, you may want the court to order a defendant to do something or stop doing something, or you may be seeking both types of relief. If you are seeking monetary relief, state your request generally. Do not request a specific amount of money.

I want the warden prosecuted to the fullest extent of the law. I want new policies implemented to protect all inmates rights. I want monetary damages in the amounts of: 1) \$50,000.00 (fifty-thousand dollars) from each Defendant in their individual capacities. 2) \$50,000.00 (fifty-thousand dollars) from each Defendant in their professional capacities.

VII. SIGNATURE

By signing this complaint, you represent to the court that the facts alleged are true to the best of your knowledge and are supported by evidence, that those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

Local Rule of Court 83.18 requires *pro se* plaintiffs to keep the court informed of their current address. If your address changes while your lawsuit is being litigated, you must immediately inform the court of the change in writing. By signing and submitting the complaint form, you agree to provide the Clerk's Office with any changes to your address where case-related papers may be served, and you acknowledge that your failure to keep a current address on file with the Clerk's Office may result in dismissal of your case.

Taji Abdullah

Signature of Plaintiff

1/19/24

Date

NAME Taji Abdulrah

D.C.P.# 08646

DAUPHIN COUNTY PRISON

501 MALL ROAD

HARRISBURG PA 17111-1299



FOREVER / USA



United States District Court
Middle District of Pennsylvania
Sylvia H. Rambo U.S. Courthouse
1501 North 6th St Suite 101
Harrisburg, PA 17102

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HARRISBURG, PA

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[Signature]
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